

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA	:	
	:	
-v.-	:	18 Cr. 340 (LGS)
	:	
SOHRAB SHARMA,	:	Supplemental Protective Order
a/k/a "Sam Sharma," and	:	
ROBERT FARKAS,	:	
a/k/a "RJ,"	:	
	:	
Defendants.	:	
-----	X	

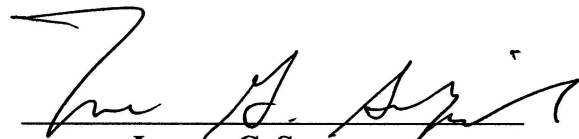
Upon the application of the Government, by its attorney, CRAIG STEWART, Attorney for the United States acting under authority conferred by 28 U.S.C. § 515, through his of counsel, Assistant United States Attorneys Samson Enzer, Negar Tekeei and Daniel Loss of the Office of the United States Attorney for the Southern District of New York, for a supplemental order restricting the dissemination of materials produced by the Government pursuant to Title 18, United States Code, Section 3500 and/or Federal Rule of Criminal Procedure 26.2 (collectively, "3500 materials"), with the consent of defendants SOHRAB SHARMA, a/k/a "Sam Sharma," and ROBERT FARKAS, a/k/a "RJ, by and through their respective attorneys, Gennaro Cariglio, Dennis Kelleher, Grant Fondo and Melissa Brumer (for SHARMA), as well as Paul Petruzzzi, Sanford Talkin and Brian Klein (for FARKAS), it is hereby:

ORDERED that: (1) 3500 materials shall not be disclosed by the defendants or their respective defense counsel (the "defense") other than as set forth in this Court's Protective Order of July 24, 2018 (Dkt. 50) in this case and as set forth herein, and shall be used by the defense solely for purposes of defending this action; (2) the defense shall not post any 3500 materials on any Internet site or network site to which persons other than the parties hereto have access, and

shall not disclose any 3500 materials to the media or any third party except as set forth below; (3) the defense is precluded from disseminating any 3500 materials (and any copies) to anyone beyond the defendants, defense counsel, any paralegal or staff employed by the defense, and any independent expert witnesses or advisors retained, pursuant to a written retainer agreement, by the defense in connection with this criminal case; (4) the defense shall provide a copy of this Order to prospective expert witnesses and persons retained by defense counsel to whom the defense has provided any 3500 materials, all such persons shall be subject to the terms of this Order, and defense counsel shall maintain a record of what information has been disclosed to such persons; (5) the Government may authorize, in writing, disclosure of material beyond that otherwise permitted without further order of this Court; (6) the provisions of this Order shall not be construed as preventing the disclosure of any 3500 materials in any motion, hearing, trial or sentencing proceeding held in this case, or to any judge or magistrate of this Court for purposes of this criminal case, except that any 3500 materials designated by the Government as sensitive 3500 materials pertinent to any motion before the Court should initially be filed under seal, absent consent of the Government or order of the Court; (7) the defense must destroy or return to the Government all 3500 materials (including all copies), at the conclusion of the trial of this matter or when any appeal has become final; and (8) each of the defendants is precluded from possessing, maintaining or reviewing any 3500 materials (and any copies) before, during or after trial, except that each of the defendants may review 3500 materials in the possession of his defense counsel in the presence of his defense counsel.

So Ordered.

Dated: March 9, 2020  
New York, New York

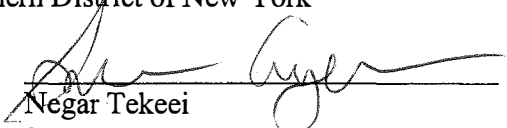


**LORNA G. SCHOFIELD**  
**UNITED STATES DISTRICT JUDGE**

AGREED AND CONSENTED TO:

CRAIG STEWART  
Attorney for the United States  
Acting Under Authority  
Conferred by 28 U.S.C. § 515  
Southern District of New York

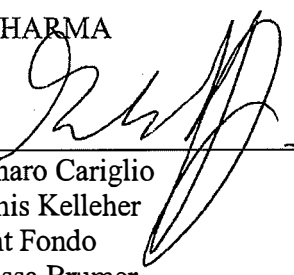
By:

  
Negar Tekeei  
Samson Enzer  
Daniel Loss  
Assistant United States Attorneys

3/6/2020  
DATE

SOHRAB SHARMA  
Defendant


By:

  
Gennaro Cariglio  
Dennis Kelleher  
Grant Fondo  
Melissa Brumer  
*Attorneys for defendant Sharma*

3/6/2020  
DATE

ROBERT FARKAS  
Defendant

By:

  
~~Paul Perruzzi~~  
Sanford Talkin  
Brian Klein  
*Attorneys for defendant Farkas*

3/6/2020  
DATE